



190 Moore Street, Suite 272, Hackensack, New Jersey 07601
T: 201 265 6400 F: 201 265 0303

1441 Broadway, New York, New York 10018
T: 212 354 0111
www.osenlaw.com

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VIA ECF

Honorable Taryn A. Merkl
United States Magistrate Judge
United States District Court, Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

**Re: *Bartlett v. Société Générale de Banque au Liban S.A.L.*, Case No. 19-cv-0007
Plaintiffs' Motion to Compel Defendants' Production of Documents, ECF
No. 270**

Dear Judge Merkl:

We write in further support of Plaintiffs' motion to overrule Defendants' foreign bank secrecy objections and to compel Defendants to produce documents responsive to Plaintiffs' first request for production, ECF No. 270.

Since Plaintiffs filed their motion to compel ten months ago, noting, *inter alia*, that Lebanon Central Bank governor Riad Salameh had "repeatedly rebuffed the Public Prosecution's queries for information" into illegal bank transfers by Lebanese political elites, "citing banking secrecy and deferring to internal reviews by the banks themselves,"¹ Mr. Salameh has now been charged with corruption. See Exhibit A, Kareem Chehayeb, *Lebanon's Central Bank governor charged with corruption*, ASSOCIATED PRESS, Feb. 23, 2023, available at <https://apnews.com/article/middle-east-business-beirut-lebanon-riad-salameh-c319b05680621a801b9798b3de49cb0a>.

Concurrently, two of the Defendants in this case, Société Générale du Banque du Liban and Bank Audi, have been charged with money laundering, an action which Lebanon's caretaker prime minister has reportedly instructed security forces not to implement. See Exhibit B, *Lebanon PM seeks to block judge who charged banks, documents show*, REUTERS, Feb. 23, 2023, available at <https://english.alarabiya.net/News/middle-east/2023/02/23/Lebanon-PM-seeks-to-block-judge-who-charged-banks-documents-show>. The current situation has been aptly encapsulated in a short documentary produced by *The New York Times* and published on February 28, 2023. See <https://www.nytimes.com/2023/02/28/opinion/lebanon-crisis-economy-bank-robbers.html?smid=url-share>.

Given the rampant corruption delineated in these recently published reports and the compelling U.S. interests in deterring terrorism and vindicating the rights of American victims of terrorism, Plaintiffs reiterate Judge Scheindlin's observation that a foreign state's "interest in

¹ ECF No. 270-10, at 5

building confidence in its banking industry does not encompass an interest in protecting the confidentiality of those who participate in the funding of international terrorism.” *Wultz v. Bank of China Ltd.*, 910 F. Supp. 2d 548, 559 (S.D.N.Y. 2012).

Respectfully submitted,

/s/ Dina Gielchinsky

cc: All counsel (via ECF)